

# Exhibit 18

**STATE OF TEXAS, ET AL. vs. UNITED STATES OF AMERICA, ET AL.**  
**Esther Jeon on 06/15/2018**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   SOUTHERN DISTRICT OF TEXAS  
3                   BROWNSVILLE DIVISION  
4  
5       STATE OF TEXAS, et al.,       )  
6                   Plaintiffs,       )  
7                   vs                ) No. 1:18-CV-68  
8       UNITED STATES OF AMERICA,   )  
9       et al.,                        )  
10                   Defendants.       )  
11                   and                )  
12       KARLA PEREZ, et al.,        )

13                   The deposition of Esther Jeon called for  
14       examination pursuant to notice and pursuant to the  
15       Federal Rules of Civil Procedure for the United  
16       States District Courts pertaining to the taking of  
17       depositions taken before JO ANN LOSOYA, Certified  
18       Shorthand Reporter within and for the County of Cook  
19       and State of Illinois at 11 East Adams, Chicago,  
20       Illinois, on June 15, 2018 at the hour of 11:00  
21       o'clock a.m.

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1 APPEARANCES:

2 MALDEF  
3 MS. PRISCILLA ORTA  
4 MS. GRISELDA VEGA SAMUEL  
5 11 East Adams Street  
6 Suite 700  
7 Chicago, Illinois 60603  
8 (312) 427-0701  
9 porta@maldef.org  
10 gvegasamuel@maldef.org  
11 Appeared on behalf of the Deponent and  
12 Intervenors;

8 ATTORNEY GENERAL OF THE STATE OF TEXAS  
9 MR. ADAM N. BITTER  
10 MS. CRISTINA M. MORENO  
11 P.O. BOX 12548  
12 Austin, Texas 78711  
13 (512) 463-2120  
14 adam.bitttter@oag.texas.gov  
15 cristina.moreno@oag.texas.gov  
16 Appeared on behalf of the Plaintiffs.

13 U.S. DEPARTMENT OF JUSTICE  
14 MR. JAMES WALKER  
15 Ben Franklin Station  
16 P.O. Box 868  
17 Washington, DC 20044  
18 (202) 532-4468  
19 james.walker3@usdoj.gov  
20 Appeared on behalf of the Defendant.

17 APPEARING TELEPHONICALLY:

18 ALEJANDRA AVILA, MALDEF  
19 NINA PERALES, MALDEF  
20 NICHOLAS DOLINSKY, New Jersey Attorney General  
21 Office

21 ALSO PRESENT:

22 NAYOUNG HANA  
23 SUSANA SANDOVAL VARGAS

24 REPORTED BY: JO ANN LOSOYA  
25 CSR LICENSE: 084-002437

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1           A.       In Houston.

2                   MS. AVILA: Hello. This is Alejandra.

3 I'm calling from the San Antonio office for MALDEF.

4                   MR. BITTER: Hi, Alejandra. Adam Bitter.

5 I have got a crew here with me in the deposition

6 room and also on the line is Nina and Nicholas

7 Dolinsky from New Jersey.

8 BY MR. BITTER:

9           Q.       So between -- just to clarify, between  
10 your first year and your second year at Harvard,  
11 where were you?

12           A.       Houston.

13           Q.       In Houston. Did you work anywhere during  
14 that time?

15           A.       I had assisted my family restaurant.

16           Q.       Is that in Houston?

17           A.       Yes.

18           Q.       Did you have any other job during your  
19 summer break between first year and second year?

20           A.       No.

21           Q.       So, second year at Harvard, did you work  
22 during any part of that year?

23           A.       Yes.

24           Q.       Where did you work first your second  
25 year?

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1           A.     For the Office of Equity, Diversity and  
2     Inclusion.

3           Q.     When did you begin working there?

4           A.     Late first semester.

5           Q.     And how did you apply for that job? Did  
6     you apply for that job?

7           A.     Yes.

8           Q.     And how did you apply for it?

9           A.     Through the Office of Equity Diversity  
10    and Inclusion.

11          Q.     Just directly submitted your application  
12    to them?

13          A.     Yes.

14          Q.     What were your responsibilities in that  
15    position?

16          A.     I worked to create spaces for students  
17    where they could talk about issues of race, gender,  
18    and class.

19          Q.     Was that a competitive process to get  
20    that job?

21          A.     I don't know.

22          Q.     Do you know if other people applied for  
23    it?

24          A.     Yes.

25          Q.     Were there other people that had your

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1 same position, or was it just one position that was  
2 held by you?

3 A. There was more than one.

4 Q. But as far as you know, there were  
5 multiple people that applied for the job that you  
6 received?

7 A. Yes.

8 Q. And actually, let me ask that question  
9 for the Harvard Financial Aid Initiative work that  
10 you did your freshman year. Do you know whether  
11 other people applied for that position as well?

12 A. Yes.

13 Q. You know of people that were turned down  
14 for that position; is that right?

15 A. Yes.

16 Q. The position with the -- I'll call it  
17 Office of Equity for short, for that office, was  
18 that a paid or unpaid position?

19 A. Paid.

20 Q. For that job, do you recall providing  
21 verification of your employment eligibility?

22 A. Yes.

23 Q. So you began working there late in your  
24 first semester of your sophomore year; is that  
25 right?

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1 REPORTER CERTIFICATE

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3 I, JO ANN LOSOYA, a Certified Shorthand  
4 Reporter within and for the County of Cook and State  
5 of Illinois, do hereby certify:

6 That previous to the commencement  
7 of the examination of the witness, the witness was  
8 duly sworn to testify the whole truth concerning the  
9 matters herein;

10 That the foregoing deposition  
11 transcript was reported stenographically by me, was  
12 thereafter reduced to typewriting under my personal  
13 direction and constitutes a true record of the  
14 testimony given and the proceedings had;

15 That the said deposition was taken  
16 before me at the time and place specified;

17 That I am not a relative or  
18 employee or attorney or counsel, nor a relative or  
19 employee of such attorney or counsel for any of the  
20 parties hereto, nor interested directly or  
21 indirectly in the outcome of this action.

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1 IN WITNESS WHEREOF, I do hereunto set my  
2 hand this June 27, 2018.

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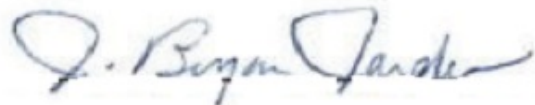
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A handwritten signature in blue ink, appearing to read "Jo Ann Losoya".

JO ANN LOSOYA, CSR  
C.S.R. No. 84-002437